

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

HELEN MEIMARIS AS EXECUTRIX and LEGAL
REPRESENTATIVE OF THE ESTATE OF ALKIVIADES
MEIMARIS AND HELEN MEIMARIS,

Plaintiffs,

-against-

JOSEPH E. ROYCE, LAWRENCE A. BLATTE,
TULIO PRIETO , JAIME LEROUX,

TBS Shipping Services Inc., Guardian Navigation ,
Services Inc., Gruposedei and Tecnisea,
Defendants.

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1:18-cv-4363 (GBD)(BCM)

SUPPLEMENTAL
AFFIRMATION TO
ALKISTIS G. MEIMARIS'
AFFIRMATIONS (ECF No's.
80, 82, & 84) IN
OPPOSITION TO
DEFENDANTS' ROYCE,
BLATTE, PRIETO, TBS
SHIPPING SERVICES
GUARDIAN NAVIGATION
MOTIONS TO DISMISS
PLAINTIFFS THIRD
AMENDED COMPLAINT
AND IN OPPOSITION
TO STAY DISCOVERY
(Exhibits 3 &4)

I, ALKISTIS G. MEIMARIS, an Attorney duly admitted to practice before
this Court, hereby affirms under penalty of perjury, the following is true and correct:

1. I am the Attorney of record for the Plaintiffs, Helen Meimaris as
Legal Representative and Executrix of the Estate of Alkiviades Meimaris and Helen
Meimaris.

2. I am fully familiar with the facts set forth herein, and make this
Affirmation in Opposition to Company Defendants, TBS Shipping Services and
Guardian Navigation, Motion to Dismiss Plaintiffs' Third Amended Complaint and
motion to stay discovery.

3. Attached as Exhibit 3, hereto is a true and correct copy of
decedent, Captain Meimaris' stock certificates for Class A and Class B shares in TBS

International, Captain Meimaris' checks, purchasing his shares in TBS International and letter from Lawrence Blatte, dated December 7, 1997 directing the deposit of those checks.

4. Attached as Exhibit 4, hereto is a true and correct copy of the Insider Trading Log from Google Court-Drive dated October 9, 2018.

5. Wherefore, in light of all of the evidentiary documentation against the Defendants, it is respectfully requested for the reasons set forth in the accompanying Memorandum of Law, that Company Defendants, TBS Shipping and Guardian Navigation, motion to dismiss Plaintiffs' Third Amended Complaint should be denied and discovery should be compelled.

6. I declare under penalty of perjury, that the foregoing is true and correct.

/s/ Alkistis G. Meimaris
ALKISTIS G. MEIMARIS

Dated: October 19, 2018

cc: Counsel of record, via ECF